OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 25, 2008

RE: NEASE CHEMICAL
SUPERFUND SITE
COLUMBIANA COUNTY
FEASIBILITY STUDY
OHIO EPA COMMENTS

Ms. Mary Logan (SR-6J)
Remedial Project Manager
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Logan:

Ohio EPA has reviewed the revised (June 2008) Feasibility Study (FS) for Operable Unit (OU) 3 of the Nease Chemical Superfund Site in Salem, Ohio. The revised report was submitted by Golder Associates, Inc., on behalf of Rütgers Organics Corporation (ROC), to address the May 7, 2008 comments provided by U.S. EPA and Ohio EPA ("the Agencies") on the Draft (March 2008) FS.

Overall, the FS report is clear and the information is well-presented, to support the remedial alternatives. The report also addresses most of Ohio EPA's previous comments on the March 2008 FS Report, and can be approved with errata pages as specified in the enclosure with this letter.

As the site moves through the remedial process, please consider the following:

"Do-not-exceed" single-sample preliminary remedial goal (PRG): As requested in our previous (May 5, 2008) comments, Ohio EPA recommends establishing a maximum "do-not-exceed" single sample, as well as a surface weighted average concentration (SWAC-based) goal. This will ensure that potential "hot spots" or areas of elevated concentration are not overlooked when basing remedial actions on one-mile and one-acre (ecological) exposure units.

Surface water quality criteria: As discussed in the Agencies' May 2008 comments, one objective of the planned remediation is to clean up mirex-contaminated sediment and floodplain soil, such that the surface water resource can, at the end of the post-construction recovery period, achieve "fishable"[a] standards. One measure to document that this has been achieved is the

[a] Analysis of MFLBC data indicates that there is no contact risk above acceptable standards in MFLBC; the waters are thus "swimmable". Feeder Creek physically does not support swimmable waters.

attainment of the mirex non-drink water quality criterion[b] (of 0.00011 µg/L) in Feeder Creek and Middle Fork Little Beaver Creek (MFLBC). Ohio EPA requests that a detailed discussion of the water quality standards and their attainment is provided in future site decision documents. The Agency is willing to work with U.S. EPA and ROC to develop an acceptable post-construction monitoring plan in Feeder Creek and MFLBC.

Floodplain (Cattle-based) PRG: Ohio EPA defers review of the additional text in Section 3.3.2 (Human Exposure, Beef and Milk Ingestion) to you and U.S. EPA's risk assessor, Dr. James Chapman, since the text discusses uncertainties associated with the range of cattle PRGs presented in Dr. Chapman's May 2008 memo to you.

However, with respect to text discussion on cattle (non)exposures to floodplain mirex during the winter months, please refer to my March 26, 2008 email to you. My discussions with the dairy farmers in the MFLBC area indicate that cattle are fed supplemental feed mostly grown on the farm during the winter months. Thus, there is a potential that cattle could be exposed to mirex in the future, even during the winter months. Please take this into consideration when determining the cattle-based PRG for floodplain soils.

Also, under separate cover I am forwarding you Food and Drug Administration (FDA) information on mirex action levels received from the Ohio Department of Agriculture for your follow up with U.S. EPA's FDA contact.

Additional information necessary in the remedial design stage(s): Golder has provided additional conceptual information on the backfill and other remedial design issues, such as dewatering and water management to address the Agencies' comments. However, details on technical parameters, such as minimum backfill thickness and fill technical parameters, are lacking. Ohio EPA anticipates that such additional details will be provided during the design stages to support remedial design; U.S. EPA ARCS guidance flowcharts on cap layer design may be a resource in the process. Also, please note that the defined minimum backfill thickness should consider at least two factors: (i) the thickness necessary to protect stream life from the underlying contamination, taking into consideration the possibility that bioturbation will open up new paths under the fill; and (ii) the thickness necessary to protect against any likely erosion events until new sediment builds up over the backfill.

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[b] Drinking water criteria apply to all water bodies within 500 yards of drinking water intakes. Since this is not the case in Feeder Creek and MFLBC, the nondrink water quality criteria apply.

Please let me know if you have any questions on the above or the errata, enclosed. Ohio EPA's technical team looks forward to working with you and the ROC technical team as the Site moves through the remedial process.

Sincerely,

Sheila Abraham, Ph.D.
Site Coordinator/Risk Management ES-III
Division of Emergency and Remedial Response

SA/kss

enclosure

ec: Dave Altfater, Ohio EPA, DSW-EAU
Rod Beals, Ohio EPA, DERR, NEDO
Timothy Christman, Ohio EPA, DERR, CO
John Estenik, Ohio EPA, DSW, CO
Steve Love, Ohio EPA, DERR, NEDO
Mylynda Shaskus, Ohio EPA, DSW, CO

NEASE OPERABLE UNIT 3 FEASIBILITY STUDY (JUNE 2008 VERSION 1)

OHIO EPA COMMENTS

A. Please refer to the cover letter for comments on the following issues:

- Mirex surface water quality criterion to be achieved;
- "Do-not-exceed" single-sample mirex preliminary remedial goal (PRG);
- Floodplain (Cattle-based) mirex PRG; and
- Additional information necessary in the remedial design stage(s).

B. Below is a listing of the errata identified and suggested resolution for the June 2008 Nease Chemical Site Operable Unit (OU) 3 Feasibility Study (FS) report:

Comment # 55a, Page 51: Revise the 1st sentence along the following lines. "No mirex has been detected in MFLBC. Mirex detected in Feeder Creek surface water did not pose a risk above acceptable levels to human health. However, the mirex detected was above Ohio EPA's surface water quality criterion for mirex...."

Comment # 55d, Page 52: Revise the 4th sentence to state that: "It is anticipated that the fish tissue monitoring will be **coordinated** with Ohio EPA's Division of Surface Water through the Division of Emergency and Remedial Response."

Comment # 56, Page 55: Revise the 5th sentence as follows: "Although the reasons for non-attainment...the stream has improved and the mirex contamination is apparently not causing impairment..." (Delete "naturally" before "improved" and add "apparently" between "is not.") MFLBC Fish and sediment monitoring: Please check if there is any contradiction between Section 6.4, Page 76, versus Section 6.3, Page 69.

End of Ohio EPA comments on the June 2008 Nease OU3 FS Report